REMARKS

I. Introduction

In response to the Office Action dated April 29, 2010, claims 1, 14, 27, and 31 have been amended. Claims 1-32 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

II. Claim Amendments

Applicants' attorney has made amendments to the claims as indicated above. These amendments were made solely for the purpose of clarifying the language of the claims, and were not required for patentability or to distinguish the claims over the prior art.

III. Disclosure Objection

On page (3) of the Office Action, the disclosure was objected to as lacking antecedent basis for the term "computer-readable medium" set form in claims 31-32.

Applicants note that the phrase "computer-readable medium" was used in the originally filed application as part of claims 31-32. To provide specific support for such claim language, Applicants have amended the specification by adding new paragraph [0146] that provides explicit support for "computer-readable medium". The addition of such language to the specification is supported by the presence of such terms in the original claims filed with the application. Accordingly, no new matter has been added to the specification.

IV. SUMMARY OF CLAIMED SUBJECT MATTER

Independent claims 1, 14, 27, and 31 are generally directed to selecting nodes relevant to a graphical image component. More specifically, a plurality of processing nodes are used to produce and display a first two-dimensional image frame (of a clip of image frames) wherein a plurality of image components makes up the first image frame. Further, the first image frame is generated by processing the plurality of data processing nodes. The user then indicates/selects a particular image component from the displayed image components. As amended, the selection consists of specifying

2D user input data (i.e., x,y input data). In response to the indicating/selecting, the system automatically selects a particular data processing node that was used to generate the indicated/selected image component. Thereafter, editing tools that are relevant to the particular selected processing node are displayed.

Support in the specification and drawings for the independent claims are shown in the following table:

CLAIM LIMITATION	SPECIFICATION/DRAWING SUPPORT
1. Apparatus for processing image data comprising processing means, input means and display means, wherein said image data is defined by a plurality of data processing nodes arranged in a hierarchical structure and said processing means is configured to perform the steps of:	[0001]-P1,L5-6; FIG. 1-108, 105, 106, 103; [0032]-[0033]-P5,L20-P6,L16; FIG. 2-201,202; [0034]-P6,L18-P7,L5; [0036]-P7,L18-P8,L1; [0044]-P10,L1-12; FIG. 4-403; FIG. 7-; 701-714; [0060]-P14,L21- L24.
generating a first two-dimensional (2D) image frame of a clip of image frames, wherein a plurality of image components makes up the first image frame, by means of processing said plurality of data processing nodes;	FIG. 4-403; FIG. 5-501-503; [0050]-[0051]-P12,L1-13; FIG. 8; [0065]-[0074]-P16,L22-P20,L7;
outputting said first image frame to said display means;	[0051]-P12, L5-13; FIG. 5-503; FIG. 6; [0054]-P13,L6-10; [0082]-P22,L8-15; FIG. 10
receiving, via said input means, first 2D user input data indicating one of said plurality of image components, wherein said first 2D user input data comprises x,y coordinate input data;	[0089]-P24,L18-P25,L1; FIG. 11-1101; [0099]-P28,L14-P29,L2; FIG. 11b-1121
in response to said receiving, automatically selecting a first data processing node considered to be appropriate to said indicated image component; and	[0089]-P24,L18-P25,L1; FIG. 11-1101-1103; [0091]-P25,L10-16; FIGs. 11a-11b; [0097]-P27,L15-24; [0099]-P28,L14-P29,L2; [0104]-P30,L25-P31,L3; [0114]-[0115]-P34,L21-P35,L6;

	FIG. 14;
displaying editing tools relevant to said first data processing node.	FIG. 11-1103; [0091]-P25,L10-16; [0116]-[0117]-P35,L8-P36,L10; FIG. 14-15
14. A method of processing image data, wherein:	[0001]-P1,L5-6; FIG. 1-108, 105, 106, 103; [0032]-[0033]-P5,L20-P6,L16; FIG. 2-201,202; [0034]-P6,L18-P7,L5; [0036]-P7,L18-P8,L1; [0044]-P10,L1-12; FIG. 4-403; FIG. 7-; 701-714; [0060]-P14,L21- L24.
a two-dimensional (2D) image frame of a clip of image frames, wherein a plurality of image components makes up the image frame, and wherein said image frame is generated by processing a plurality of data processing nodes arranged in a hierarchical structure;	[0001]-P1,L5-6; FIG. 1-108, 105, 106, 103; [0032]-[0033]-P5,L20-P6,L16; FIG. 2-201,202; [0034]-P6,L18-P7,L5; [0036]-P7,L18-P8,L1; [0044]-P10,L1-12; FIG. 4-403; FIG. 5-501-503; [0050]-[0051]-P12,L1-13; FIG. 7-; 701-714; [0060]-P14,L21- L24; FIG. 8; [0065]-[0074]-P16,L22-P20,L7;
said image frame is displayed to a user;	[0051]-P12, L5-13; FIG. 5-503; FIG. 6; [0054]-P13,L6-10; [0082]-P22,L8-15; FIG. 10
said user manually selects one of said plurality of image components for adjusting, wherein said manual selection comprises x,y coordinate input data;	[0089]-P24,L18-P25,L1; FIG. 11-1101; [0099]-P28,L14-P29,L2; FIG. 11b-1121
in response to said selecting, a first data processing node used to generate said image component is automatically selected; and	[0089]-P24,L18-P25,L1; FIG. 11-1101-1103; [0091]-P25,L10-16; FIGs. 11a-11b; [0097]-P27,L15-24; [0099]-P28,L14-P29,L2; [0104]-P30,L25-P31,L3; [0114]-[0115]-P34,L21-P35,L6; FIG. 14;
editing tools relevant to said first data processing node are displayed to said user.	FIG. 11-1103; [0091]-P25,L10-16; [0116]-[0117]-P35,L8-P36,L10; FIG. 14-15

27. In a computer system having a graphical user interface including a display and a user interface selection device, a method of processing image data, wherein	[0001]-P1,L5-6; FIG. 1-108, 105, 106, 103; [0032]-[0033]-P5,L20-P6,L16; FIG. 2-201,202; [0034]-P6,L18-P7,L5; [0036]-P7,L18-P8,L1; [0044]-P10,L1-12; FIG. 4-403; FIG. 7-; 701-714; [0060]-P14,L21- L24.
a two-dimensional (2D) image frame of a clip of image frames, wherein a plurality of image components makes up the image frame, and wherein the image frame is generated by processing a plurality of data processing nodes arranged in a hierarchical structure;	[0001]-P1,L5-6; FIG. 1-108, 105, 106, 103; [0032]-[0033]-P5,L20-P6,L16; FIG. 2-201,202; [0034]-P6,L18-P7,L5; [0036]-P7,L18-P8,L1; [0044]-P10,L1-12; FIG. 4-403; FIG. 5-501-503; [0050]-[0051]-P12,L1-13; FIG. 7-; 701-714; [0060]-P14,L21- L24; FIG. 8; [0065]-[0074]-P16,L22-P20,L7;
said image frame is displayed to a user by means of said display;	[0051]-P12, L5-13; FIG. 5-503; FIG. 6; [0054]-P13,L6-10; [0082]-P22,L8-15; FIG. 10
said system responds to manual operation of said user interface selection device when said user manually selects one of said plurality of image components for adjusting by inputting x,y coordinate input data;	[0089]-P24,L18-P25,L1; FIG. 11-1101; [0099]-P28,L14-P29,L2; FIG. 11b-1121
in response to said manual selection, said system automatically identifies a first data processing node used to generate the image component that has been selected; and	[0089]-P24,L18-P25,L1; FIG. 11-1101-1103; [0091]-P25,L10-16; FIGs. 11a-11b; [0097]-P27,L15-24; [0099]-P28,L14-P29,L2; [0104]-P30,L25-P31,L3; [0114]-[0115]-P34,L21-P35,L6; FIG. 14;
said system updates said graphical user interface to present editing tools relevant to said first data processing node.	FIG. 11-1103; [0091]-P25,L10-16; [0116]-[0117]-P35,L8-P36,L10; FIG. 14-15

31. A computer-readable medium comprising a computer program storage device storing instructions that when read and executed by a computer, results in the computer performing a method for processing image data, the method comprising:	[0001]-P1,L5-6; FIG. 1-108, 105, 106, 103; [0032]-[0033]-P5,L20-P6,L16; FIG. 2-201,202; [0034]-P6,L18-P7,L5; [0036]-P7,L18-P8,L1; [0044]-P10,L1-12; FIG. 4-403; FIG. 7-; 701-714; [0060]-P14,L21- L24.
generating a two-dimensional (2D) image frame of a clip of image frames, wherein a plurality of image components makes up the image frame, by processing a plurality of data processing nodes arranged in a hierarchical structure;	[0001]-P1,L5-6; FIG. 1-108, 105, 106, 103; [0032]-[0033]-P5,L20-P6,L16; FIG. 2-201,202; [0034]-P6,L18-P7,L5; [0036]-P7,L18-P8,L1; [0044]-P10,L1-12; FIG. 4-403; FIG. 5-501-503; [0050]-[0051]-P12,L1-13; FIG. 7-; 701-714; [0060]-P14,L21- L24; FIG. 8; [0065]-[0074]-P16,L22-P20,L7;
displaying said image frame to a user;	[0051]-P12, L5-13; FIG. 5-503; FIG. 6; [0054]-P13,L6-10; [0082]-P22,L8-15; FIG. 10
responding to a user's manual selection of one of said plurality of image components for adjustment, wherein said manual selection comprises x,y coordinate input data;	[0089]-P24,L18-P25,L1; FIG. 11-1101; [0099]-P28,L14-P29,L2; FIG. 11b-1121
in response to said selection, automatically identifying a first data processing node used to generate said image component that has been selected; and	[0089]-P24,L18-P25,L1; FIG. 11-1101-1103; [0091]-P25,L10-16; FIGs. 11a-11b; [0097]-P27,L15-24; [0099]-P28,L14-P29,L2; [0104]-P30,L25-P31,L3; [0114]-[0115]-P34,L21-P35,L6; FIG. 14;
presenting editing tools relevant to said first data processing node to said user.	FIG. 11-1103; [0091]-P25,L10-16; [0116]-[0117]-P35,L8-P36,L10; FIG. 14-15

V. Prior Art Rejections

In paragraph (2) of the Office Action, claims 1-32 were rejected under 35 U.S.C. §102(e) as being anticipated by Grinstein et al., U.S. Patent 6,714,201 (Grinstein).

Specifically, claims 1, 14, 27, and 31 were rejected as follows:

> **As to independent claims 1, 14, 27 and 31** (e.g. apparatus, method, system, computer-readable medium, etc), Grinstein teaches apparatus for processing image data (co1.74, line 43 - co1.75, line 29) comprising processing means, input means and display means (col.68,lines 37-57), wherein said image data is defined by a plurality of data processing nodes arranged in a hierarchical structure *(col.55,lines 1-10; nodes displayed in tree view window 530)* and said processing means is configured to perform the steps of: generating a first image frame of a clip of image frames wherein a plurality of image components makes up the first image frame by means of processing said plurality of data processing nodes *(col.53,lines 13-20; the Mojo gui window provides a 3d hierarchical graphic model that is capable of showing animation (known as a group of frames; col.6,lines 12-23 and Table 2 shows evidence that these 3D models correspond to frames of animation "image frame of a clip of image frames') within the window 503 where the user may interact with the 3d hierarchical graphic model and the corresponding tree view to manipulate animations);*
>
> outputting said first image frame to said display means *(figure 34; depicts the display of the 3d hierarchical graphic model and tree view of nodes corresponding to 3d model for the current animation frame of frames the user is editing or viewing);* receiving, via said input means, first user input data indicating one of said plurality of image components (col.55,lines 43-52); in response to said receiving, automatically selecting a first data processing node considered to be appropriate to said indicated component (col.55,lines 43-60) displaying editing tools relevant to said first data processing node; and outputting said second image frame to said display means *(col.55,line 61- col.56,line 24; the user is able to select a node or object and be given a pop-up dialog box displaying edit tools to be chosen and manipulated by the user).*
>
> Grinstein teaches computer-readable medium comprising a computer program storage device storing instructions that when read and executed by a computer, results in the computer performing a method for processing image data (col. 68, lines 37-67; various examples of multiple platforms at which the system may be implemented on and how the system is implemented).

Applicant traverses the above rejections for one or more of the following reasons:

(1) Grinstein fails to teach, disclose or suggest a 2D image plane;

(2) Grinstein fails to teach, disclose or suggest 2D x,y input data; and

(3) Grinstein fails to teach, disclose or suggest selecting a data processing node used to generate an identified image component.

Independent claims 1, 14, 27, and 31 are generally directed to selecting nodes relevant to a graphical image component. More specifically, a plurality of processing nodes are used to produce and display a first two-dimensional image frame (of a clip of image frames) wherein a plurality of image components makes up the first image frame. Further, the first image frame is generated by processing the plurality of data processing nodes. The user then indicates/selects a particular image

component from the displayed image components. As amended, the selection consists of specifying 2D user input data (i.e., x,y input data). In response to the indicating/selecting, the system automatically selects a particular data processing node that was used to generate the indicated/selected image component. Thereafter, editing tools that are relevant to the particular selected processing node are displayed.

Consequently, there are several unique and non-obvious features that distinguish the present invention from that of the cited art. Firstly, the image that is being worked with is a 2D image. In addition, the user specifies 2D coordinates (i.e., x,y coordinate input data) for specifying a particular image component. Thereafter, the specific node that was used to generate the identified image component is automatically selected. Thus, since the nodes are used to actually generate the particular image components that are displayed, the identification (by the user) of a particular x,y location on the image enables the automatic selection of the node(s) actually used to generate that particular component. Thus, the user is not moving around in a 3D model, nor is the user looking at a representation of motion for the image – instead, the user is examining a 2D image and specifies a particular 2D location in that image – in response, a particular image component is identified as well as the node used to generate that 2D image component.

The cited reference does not teach nor suggest these various elements of Applicants' independent claims. Grinstein is directed towards modeling motion in a computer application (see title and abstract). Grinstein consistently refers to a 3D model that is capable of showing animation (see col. 6, lines 12-23; col. 53, lines 13-20; and FIG. 33). The Office Action relies on FIG. 33 and FIG. 34 to reject these various claim limitations. Such figures illustrate a scene view window 503 illustrating a 3D hierarchical graphic model 502 of a running man. The user clicks in the scene window 503 (on a portion of model 502) and thereby selects a particular part that has motion associated therewith (see col. 55, lines 53-62). As a result, a bounding box 544 is drawn around the node/part in the scene window 503 (see col. 55, lines 53-62). In addition, in the tree-view window 530, a selected node 536AA is highlighted (see col. 55, lines 53-62).

However, what is of particular importance is that the tree-view window 530 does not display nodes used to actually generate the image displayed in scene view 503. Instead, tree-view window 530 illustrates model nodes 537 and the ability to define motion for such nodes (see FIG. 34 and supporting text in col. 55, lines 43-col. 56, line 24). Again, Grinstein is not directed towards

generating a 2D image using specific nodes and the ability to use the nodes used to generate a selected image component. Instead, Grinstein is directed towards defining motion for a 3D model. As set forth in col. 55, line 60-col. 56, line 24 (and corresponding FIG. 38), the user has selected a left sleeve parent node. Further, the user has right clicked on a swing motion node 540AA which causes a motion options menu to be displayed for specifying parameters that define the motion for the swing movement/motion. Again, the nodes displayed in tree-view window 530 are not nodes used to actually generate a 2D image as explicitly required in the present claims. Further, Grinstein's user is not specifying 2D input data but instead is selecting a part that has a corresponding motion.

In view of the above, Applicants submit that Grinstein is directed towards a different environment and fails to provide, teach, disclose, or suggest various explicitly claimed limitations. As a result, Grinstein fails to establish a prima facie case of unpatentability and is clearly in error.

Moreover, the various elements of Applicants' claimed invention together provide operational advantages over Grinstein. In addition, Applicants' invention solves problems not recognized by Grinstein.

Thus, Applicants submit that independent claims 1, 14, 27 and 31 are allowable over Grinstein. Further, dependent claims 2-13, 15-26, 28-30 and 32 are submitted to be allowable over Grinstein in the same manner, because they are dependent on independent claims 1, 14, 27 and 31, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-13, 15-26, 28-30 and 32 recite additional novel elements not shown by Grinstein.

VI. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

GATES & COOPER LLP
Attorneys for Applicant(s)

Howard Hughes Center
6701 Center Drive West, Suite 1050
Los Angeles, California 90045
(310) 641-8797

Date: July 14, 2010

By: /Jason S. Feldmar/
Name: Jason S. Feldmar
Reg. No.: 39,187

JSF/

G&C 30566.335-US-01